



# Oregon

John A. Kitzhaber, MD, Governor

## Department of Environmental Quality

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May 28, 2014

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Project Manager  
Port of Portland  
7200 NE Airport Way  
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*via electronic delivery*

RE: DEQ Approval – Revised Human Health Residual Risk Assessment and Revised Ecological Residual Risk Assessment  
Willamette Cove Upland Facility  
ECSI #2066

Dwight:

The Oregon Department of Environmental Quality (DEQ) approves the *Revised Human Health Residual Risk Assessment* and *Revised Ecological Residual Risk Assessment*, separate documents for the Willamette Cove upland facility prepared on your behalf by Formation Environmental, dated December 2013.

These documents were submitted to DEQ as draft versions in February 2013. DEQ provided a comment letter on the documents on July 19, 2013. Formation Environmental responded to DEQ comments with proposed solutions in a letter dated October 7, 2013. DEQ approved the comments and proposed solutions in a follow-up letter dated November 8, 2013. Revised Residual Risk Assessment (RRA) documents were submitted in December 2013.

The findings of the residual risk assessments will support the removal actions and final cleanup remedies planned for the Willamette Cove upland facility. As you know, additional upland sampling performed after submission of the RRA documents, at the request of DEQ, has identified elevated levels of dioxins/furans in surface soil, which impacts conclusions presented in the RRAs. Additionally, refinement of appropriate site-specific preliminary remediation goals (PRGs) for site contaminants has been completed.

Moving forward, we recommend that a revised Feasibility Study be submitted to DEQ that includes a section presenting the results of post-RRA upland sampling work, and discussing how these new data, screened against site-specific final PRGs, alter the conclusion of the RRA documents. This information will inform development of remedial action objectives and final remedy selection for the upland site.

We can discuss this matter further in our upcoming June 3 meeting.

Sincerely,



Kenneth Thiessen, Hydrogeologist  
NWR Cleanup Section

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DEQ NWR Cleanup Files, ECSI# 2066